



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155, 14-D12
Seattle, WA 98101-3144

REGIONAL
ADMINISTRATOR'S
DIVISION

October 10, 2023

Quentin Hall, Project Manager
Tongass National Forest
Thorne Bay Ranger District
P.O. Box 19001
Thorne, Alaska 99919

Dear Quentin Hall:

The U.S. Environmental Protection Agency has reviewed U.S. Forest Service's September 2023 scoping notice announcement regarding the Thorne Bay Basin Integrated Resource Management project (EPA Project Number 23-0040-USFS). EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

According to the notice, USFS proposes to evaluate the potential environmental impacts associated with providing commercial young-growth harvest opportunities, implementing riparian and road restoration activities, and improving wildlife habitat in the project area over the next 15 years. The project area includes approximately 26,371 acres of National Forest System land near Thorne Bay, Alaska on Prince of Wales Island.

EPA supports the overall purpose of the proposed action to support resilient forests, enhance fish and wildlife habitat, and promote cultural, traditional, and subsistence uses. We recommend that the EA include the environmental effects of the proposed project on natural resources and any necessary mitigation measures to reduce or offset those effects.

Specifically, EPA recommends the NEPA document provides the following information for decision makers and the public:

- **Roads and sedimentation:** describe the current impacts of roads to resources in the watershed and any change in impacts from the proposed action (e.g. road miles and density); how roads will be managed to ensure soil stability (e.g. decommissioning or stabilizing roads); evaluate utilizing the existing road system to minimize the environmental impacts of road construction to the maximum extent practicable.
- **Water quality:** identify water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific discharges and pollutants likely to impact those waters; disclose information regarding relevant Total Maximum Daily Load allocations for any impaired waters listed on the latest state Clean Water Act § 303(d) list or Integrated Report (e.g. water quality standards and pollutants of concern); and consistent with the antidegradation policy of the State of Alaska's Clean Water Act water quality standards, demonstrate that the proposed action will prevent the deterioration of any water bodies and protect existing uses.

- **Riparian areas:** where riparian treatments have the potential to impact water quality and associated riparian functions (e.g., water temperature), describe the potential impacts and basis for those impacts.
- **Air quality:** describe in detail the ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, criteria pollutant nonattainment and maintenance areas, and potential air quality impacts of the proposed action (including reasonably certain long-term and secondary effects).
- **Tribal Consultation:** where performing government to government consultation requirements consistent with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*, describe the issues raised during the consultations and how those issues were addressed.
- **Environmental Justice (EJ):** disclose efforts taken to ensure meaningful public participation during the development of the impact analysis. If communities with EJ concerns will be impacted by the proposed project, disclose what efforts were taken to ensure consistency with Executive Order 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*. This E.O. directs federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects of Federal activities on communities with EJ concerns. Consider data from EJScreen, EPA's nationally consistent EJ screening and mapping tool¹ as well as data from state and county level reports and local knowledge including data from the Alaska Department of Health,² the Alaska Department of Environmental Conservation,³ and the Alaska Department of Fish and Game.⁴
- **Climate Change:** consider potential climate impacts, mitigation, and adaptation issues in response to Executive Order 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*.
- **Ecological Connectivity:** discuss how the project may impact wildlife corridors and connectivity in accordance with *CEQ Guidance to Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors*.⁵
- **Mitigation:** identify and describe appropriate mitigation measures to minimize environmental impacts associated with the project, specifying which agency or entity would be responsible for implementing.

Thank you for the opportunity to provide comments for this project. If you have questions about this review, please contact Emily Bitalac of my staff at (206) 553-2581 and bitalac.emily@epa.gov, or me, at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief
Policy and Environmental Review Branch

¹ <https://ejscreen.epa.gov/mapper/>. Accessed 10/4/2023.

² <https://health.alaska.gov/dph/vitalstats/pages/data/default.aspx>. Accessed 10/4/2023.

³ <https://data-soa-adec.opendata.arcgis.com/>. Accessed 10/4/2023.

⁴ <https://www.adfg.alaska.gov/index.cfm?adfg=maps.data>. Accessed 10/4/2023.

⁵ <https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf>. Accessed 10/4/2023.